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Attorneys for Defendant  
NEC ELECTRONICS AMERICA, INC.  
and  
Defense Liaison Counsel

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

**IN RE STATIC RANDOM ACCESS  
MEMORY (SRAM) ANTITRUST  
LITIGATION**

**Case No.: M:07-CV-01819-CW**

**MDL No. 1819**

**This Document Relates To:  
ALL ACTIONS**

**STIPULATION AND ~~PROPOSED~~  
ORDER RE RESPONSES TO  
COMPLAINTS**

Pursuant to the Court's request at the December 20, 2007 hearing, the Direct Purchaser Plaintiffs, Indirect Purchaser Plaintiffs, and properly served Defendants hereby stipulate to, subject to the Court's approval, the following deadlines:

1. Domestic Defendants will answer, move, or otherwise respond to the Direct Purchasers' Consolidated Complaint and the Indirect Purchasers' Second Amended Consolidated Class Action Complaint by April 7, 2008.

2. Foreign Defendants will answer, move, or otherwise respond to the Direct Purchasers' Consolidated Complaint and Indirect Purchasers' Second Amended Consolidated Class Action Complaint by April 28, 2008.<sup>1</sup>

<sup>1</sup> All Foreign Defendants named by the Direct Purchasers and the Indirect Purchasers have now been served or have agreed to accept service.

1  
2 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.  
3

4  
5 Dated: March 14, 2008

COTCHETT, PITRE & McCARTHY

6 By: /s/ Neil Swartzberg  
Steven N. Williams

7  
8 *Interim Lead Counsel for Direct  
Purchaser Class*

9  
10 Dated: March 14, 2008

ZELLE, HOFMAN, VOLBEL, MASON &  
GETTE LLP

11 By: /s/ Pamela Woodside  
12 Pamela Woodside

13 *Interim Lead Counsel for Indirect  
14 Purchaser Class*

15 Dated: March 14, 2008

THELEN, REID, BROWN, RAYSMAN  
& STEINER LLP

16 By: /s/ Paul R. Griffin  
17 Paul R. Griffin

18 *Liaison Counsel for Defendants*

19  
20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21  
22 Dated: March <sup>20</sup>, 2008



23 Hon. Claudia Wilken

24 *United States District Judge  
25 Northern District of California*  
26  
27  
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ATTESTATION OF FILING

Pursuant to N.D. Cal. General Order No. 45, section 45 X(B), I, Paul R. Griffin, hereby attest that concurrence in the filing of this stipulation and proposed order has been obtained from: Lead Counsel for the Indirect-Purchaser Plaintiffs, Lead Counsel for the Direct-Purchaser Plaintiffs and for Defendants who have provided the conformed signatures above.

THELEN REID BROWN RAYSMAN &  
STEINER LLP

By: /s/ Paul R. Griffin  
Paul R. Griffin

*Defense Liaison Counsel*

I, Camellia Gamble, certify and declare under penalty of perjury that I: am a citizen of the United States; am over the age of 18 years; am employed by Thelen Reid Brown Raysman & Steiner, LLP, at the address indicated, whose members are members of the State Bar of California and at least one of whose members is a member of the Bar of each Federal District Court within California; am not a party to or interested in the cause entitled upon the document to which this Certificate of Service is affixed; and that I served a true and correct copy of the following document(s) in the manner indicated below:

by today depositing, at San Francisco, California, the said document(s) in the United States mail in a sealed envelope, with first-class postage thereon fully prepared; (and/or)

by overnight mail to the parties listed below;

(BY ELECTRONIC MAIL.) I caused such document(s) to be emailed to the offices and/or to attorneys of offices of the above-named addressee(s).

Dated: March 14, 2008

Signed /s/ Camellia Gamble  
Camellia Gamble